

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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**INEOS FLUOR AMERICAS LLC,**

*Plaintiff,*

**v.**

**HONEYWELL INTERNATIONAL INC.,**

*Defendant.*

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**C.A. No. 06-189-SLR**

**PLAINTIFF'S NOTICE OF DEPOSITIONS**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, plaintiff INEOS Fluor Americas LLC shall take the depositions upon oral examination of defendant Honeywell International Inc. by and through its following employees on the following dates and times:

John Grant	Sales Leader for Industrial Products Sales, Honeywell International Inc., 101 Columbia Rd, Morristown, NJ 07962	11/15/2006	9:00 a.m.
Don Taylor	Materials Management Leader—Specialty Materials Purchasing, Honeywell International Inc., 101 Columbia Rd, Morristown, NJ 07962	11/29/2006	9:00 a.m.
Blake Wiseman	Representative for Residential Distribution Environment Combustion Control, Honeywell International Inc., 605 N. Davis Ave., Unit 3, Richmond, VA 23220	11/30/2006	9:00 a.m.

Each deposition shall be taken at the offices of Axinn, Veltrop & Harkrider LLP, 1370 Avenue of the Americas, 19<sup>th</sup> Floor, New York, New York 10019, shall continue until completed, and shall be recorded stenographically before an officer appointed or designated as specified in Rule 28 of the Federal Rules of Civil Procedure.

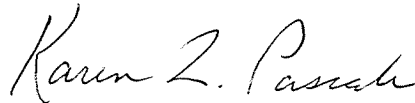
In accordance with Rule 30(b)(5) of the Federal Rules of Civil Procedure, these deponents are requested to produce at their depositions each document in their possession, custody, or control, including without limitation correspondence, electronic mail, and calendar entries, that refers to, relates to, or reflects:

1. The termination, expiration, renewal, or replacement of the HF Contract between Allied-Signal Inc. and ICI Americas Inc. dated as of November 30, 1989 for the supply of HF (the "1989 Contract").
2. Negotiations for or discussions concerning any HF supply agreement between (a) INEOS and Honeywell or (b) Honeywell and Quimica Fluor.
3. Any "hardship provision" in the Heads of Agreement or a new HF supply agreement between INEOS and Honeywell.
4. Honeywell's increase of the price of HF to be supplied to INEOS in 2006.
5. Any meeting, correspondence, or contract between or among Honeywell, Quimica Fluor, or INEOS that refers to, relates to, or reflects HF.

You are invited to attend and examine each witness.

October 10, 2006

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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**CERTIFICATE OF SERVICE**

I, Karen L. Pascale, Esquire, hereby certify that on October 10, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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P.O. Box 1347  
Wilmington, DE 19899

I further certify that on October 10, 2006, I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

**By E-Mail**

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